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5-15-24

JM/2022R01088

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA
v.
PETER KRILL

Crim. No. 24-330 (ESK)
AT 8:30 M
CLERK, U.S. DISTRICT COURT - DNJ
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2232(a)

RECEIVED

MAY 15 2024

INDICTMENT

MAY 15 2024

FILED

AT 8:30 M
CLERK, U.S. DISTRICT COURT - DNJ

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

COUNT ONE
(Possession of Ammunition by a Convicted Felon)

On or about December 15, 2022, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

PETER KRILL,

knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess:

- a) a black 9mm privately manufactured firearm bearing no identifiable serial number on the frame or receiver, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV;" and a slide bearing the manufacturer marking of Glock 17 Austria, 9x19, with serial number BHMT889, and loaded with 32 rounds of 9 mm caliber ammunition;
- b) a black 9mm privately manufactured firearm bearing no identifiable serial numbers on the frame or slide, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV;"

- c) two black 9 mm privately manufactured firearms bearing no identifiable serial number on the frame or slide, the frames of which were marked "Model PF940C, Polymer80 Inc., Made in USA, Dayton, NV;"
- d) a tan and black .40 caliber semi-automatic privately manufactured firearm bearing no identifiable serial number on the frame or receiver, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV," with a slide bearing the manufacturer marking of "Glock 22, USA, .40" and serial number AANU691, and loaded with 15 rounds of .40 caliber ammunition;
- e) a black 9 mm semi-automatic privately manufactured firearm, bearing no identifiable serial number on the frame or receiver and a marking of A167203 on the inside of the slide, the frame of which was marked "Newington, NH, USA," and loaded with 16 rounds of 9 mm ammunition;
- f) a black 5.56 privately manufactured semi-automatic rifle bearing no identifiable serial number on the frame or receiver, with "DTI" stamped on the rail system around the barrel, and loaded with a drum magazine loaded with 52 rounds of 5.56 caliber ammunition;
- g) a blue, black, and yellow .45 caliber privately manufactured semi-automatic firearm bearing no identifiable serial number on the frame or receiver;
- h) ten boxes of ammunition, totaling approximately 5,116 rounds, including the following calibers and types: 40 caliber, 5.56 rifle rounds, .45 caliber, 9mm, .38 Special, and 2.23 rifle rounds; and

- i) nine loaded pistol magazines containing approximately 131 rounds, including .40 caliber and 9mm rounds,

and the ammunition was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
(Destruction or Removal of Property to Prevent Seizure)

On or about December 15, 2022, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

PETER KRILL,

before, during, and after the search for and seizure of property by agents of the Federal Bureau of Investigation, persons authorized to make such search and seizure, did knowingly destroy, damage, waste, dispose of, transfer, and otherwise take action on, and attempt to destroy, damage, waste, dispose of, transfer, and otherwise take action on, an Apple iPhone 11 Pro, IMEI 35323410665583, for the purpose of preventing and impairing the Government's lawful authority to take said property into its custody and control.

In violation of Title 18, United States Code, Section 2232(a).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of Count One in violation of Title 18, United States Code, Section 922(g)(1), set forth in this Indictment, the defendant,

PETER KRILL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offense, including, but not limited to

- a) a black 9mm privately manufactured firearm bearing no identifiable serial number on the frame or receiver, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV;" and a slide bearing the manufacturer marking of Glock 17 Austria, 9x19, with serial number BHMT889, and loaded with 32 rounds of 9 mm caliber ammunition;
- b) a black 9mm privately manufactured firearm bearing no identifiable serial numbers on the frame or slide, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV;"
- c) two black 9 mm privately manufactured firearms bearing no identifiable serial number on the frame or slide, the frames of which were marked "Model PF940C, Polymer80 Inc., Made in USA, Dayton, NV;"

- d) a tan and black .40 caliber semi-automatic privately manufactured firearm bearing no identifiable serial number on the frame or receiver, the frame of which was marked "Model PF940V2, Polymer80 Inc., Made in USA, Dayton, NV," with a slide bearing the manufacturer marking of "Glock 22, USA, .40" and serial number AANU691, and loaded with 15 rounds of .40 caliber ammunition;
- e) a black 9 mm semi-automatic privately manufactured firearm, bearing no identifiable serial number on the frame or receiver and a marking of A167203 on the inside of the slide, the frame of which was marked "Newington, NH, USA," and loaded with 16 rounds of 9 mm ammunition;
- f) a black 5.56 privately manufactured semi-automatic rifle bearing no identifiable serial number on the frame or receiver, with "DTI" stamped on the rail system around the barrel, and loaded with a drum magazine loaded with 52 rounds of 5.56 caliber ammunition;
- g) a blue, black, and yellow .45 caliber privately manufactured semi-automatic firearm bearing no identifiable serial number on the frame or receiver;
- h) ten boxes of ammunition, totaling approximately 5,116 rounds, including the following calibers and types: 40 caliber, 5.56 rifle rounds, .45 caliber, 9mm, .38 Special, and 2.23 rifle rounds; and
- i) nine loaded pistol magazines containing approximately 131 rounds, including .40 caliber and 9mm rounds.

SUBSTITUTE ASSETS PROVISION

3. If any of the above forfeitable property, as a result of any act or omission or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL

FOREPERSON

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney